

### Indiana Department of Environmental Management

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon Governor

Lori F. Kaplan Commissioner

August 15, 2003

100 North Senate Avenue P.O. Box 6015 Indianapolis, Indiana 46206-6015 (317) 232-8603 (800) 451-6027 www.in.gov/idem

TO: Interested Parties / Applicant

RE: Visteon Systems, LLC SPM 041-16488-00004

FROM: Paul Dubenetzky

Chief, Permits Branch Office of Air Quality

## Notice of Decision: Approval - Effective Immediately

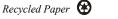
Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, within eighteen (18) days of the mailing of this notice. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- the date the document is delivered to the Office of Environmental Adjudication (OEA); (1)
- the date of the postmark on the envelope containing the document, if the document is mailed to (2)OEA by U.S. mail; or
- (3)The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- the name and address of the person making the request; (1)
- (2) the interest of the person making the request;
- identification of any persons represented by the person making the request; (3)
- the reasons, with particularity, for the request; (4)
- the issues, with particularity, proposed for considerations at any hearing; and (5)
- identification of the terms and conditions which, in the judgment of the person making the request, (6) would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.



Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency 401 M Street Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.





Frank U Bannon
Governor

Lori F. Kaplan Commissioner

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August 15, 2003

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603

Larry Hinkle Visteon Systems, LLC 4747 Western Avenue Connersville, Indiana 47331

Re: 041-16488-00004

Significant Permit Modification to: Part 70 permit No.: T041-6896-00004

(800) 451-6027 www.IN.gov/idem

Dear Mr. Hinkle:

Visteon Systems, LLC was issued Part 70 operating permit T041-6896-00004 on February 17, 1999 for operation of an automotive parts manufacturing plant. A letter requesting changes to this permit was received on November 20, 2002. Pursuant to the provisions of 326 IAC 2-7-12 (d) (1) a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. The revised permit pages are attached.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter please contact Alic Bent, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (973) 575-2555, ext. 3206 or dial (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permits Branch Office of Air Quality

#### Attachments AB/EVP

cc: File - Fayette County

Air Compliance Section Inspector - Joe Foyst Compliance Data Section - Karen Nowak Technical Support and Modeling - Michele Boner Administrative and Development



### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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# PART 70 SIGNIFICANT PERMIT MODIFICATION OFFICE OF AIR QUALITY

### Visteon Systems LLC 4747 Western Avenue, Connersville, Indiana 47331

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T041-6896-00004	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: February 17, 1999 Expiration Date: February 17, 2004

First Administrative Amendment No.: 041-10719, issued on April 10, 1999. Second Administrative Amendment No.: 041-11046, issued on August 5, 1999. First Minor Permit Modification No.: 041-12053, issued on May 25, 2000. Third Administrative Amendment No.: 041-12419, issued on October 2, 2000. First Significant Permit Modification No.: 041-14961, issued on January 10, 2002.

Second Significant Permit Modification: 041-16488-00004	Pages Affected: 46b, 46c and 50a		
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 15, 2003 Expiration Date: August 15, 2008		

#### Second Significant Permit Modification SPM 041-16488-00004 Reviewed by: AB/EVP

Page 46b of 52 OP No. T041-6896-00004

#### **SECTION D.8**

#### **FACILITY OPERATION CONDITIONS**

#### Emission Limitations and Standards [326 IAC 8-1-6] [326 IAC 2-2]

#### D.8.5 BACT Condition [326 IAC 8-1-6] [326 IAC 2-2]

Pursuant to 326 IAC 8-1-6, the thermal incinerator (rated at 5.5 MMBtu per hour) on the one (1) thermal de-oiler (De-oiler #3) shall be in operation at all times that the de-oiler is in operation. The thermal de-oiler shall use less than 77.18 tons of oil per 12 consecutive month period, with compliance determined at the end of each month. The VOC shall be limited to 0.82 pound of VOC/ pound of oil used. These limits are required to limit VOC emissions for the thermal de-oiler to less than 63.29 tons of VOC per 12 consecutive month period. VOC emissions from the thermal de-oiler shall be controlled using the thermal incinerator with a minimum overall VOC control efficiency (including capture and destruction efficiencies) of 95%. Compliance with the requirement shall also render 326 IAC 2-2 not applicable.

#### D.8.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the thermal de-oiler (De-oiler #3) and the thermal incinerator controlling VOC emissions.

#### **Compliance Determination Requirements**

#### D.8.7 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, the Permittee shall perform VOC testing on Thermal De-oiler #3 to confirm the validity of the uncontrolled VOC emission factor of 0.82 pound of VOC emitted per pound of oil used, as well as the VOC control efficiency for the one (1) thermal incinerator, as required in Condition D.8.5, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### **Compliance Monitoring Requirements**

#### D.8.8 Monitoring

- (a) The thermal incinerator shall operate at all times that the process is in operation. When operating, the thermal incinerator on De-oiler #3 shall maintain a minimum operating temperature of 1,500° F and a gas residence time in the oxidizing zone for the incinerator of 1.5 seconds or a temperature and gas residence time determined in the compliance tests described in Condition D.8.7.
- (b) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.

#### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.8.9 Record Keeping Requirements

(a) To document compliance with Conditions D.8.5 and D.8.8, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.8.5.

#### Second Significant Permit Modification SPM 041-16488-00004 Reviewed by: AB/EVP

(1) The amount and VOC content of each de-oiling material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

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OP No. T041-6896-00004

- (2) The total VOC usage for each month;
- (3) The continuous temperature records for the thermal incinerator and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (4) The gas residence time in the oxidizing zone for the thermal incinerator to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

#### D.8.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.8.5 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

> Date: Phone:

Second Significant Permit Modification SPM 041-16488-00004 Reviewed by: AB/EVP

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

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OP No. T041-6896-00004

## Part 70 Quarterly Report

Source Name: Source Address: Mailing Address: Part 70 Permit No.: Facility: Parameter: Limit:	month period, with complia		
Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			
9	No deviation occurred in th	is quarter.	
9	Deviation/s occurred in this Deviation has been reported		
	Position:		<u> </u>

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Permit Modification to a Part 70

Operating Permit

#### **Source Background and Description**

Source Name: Visteon Systems, LLC

Source Location: 4747 Western Avenue, Connersville, Indiana 47331

County: Fayette SIC Code: 3714

Operation Permit No.: T041-6896-00004
Operation Permit Issuance Date: February 17, 1999
Permit Modification No.: 041-16488-00004
Permit Reviewer: Alic Bent/EVP

The Office of Air Quality (OAQ) has reviewed a modification application from Visteon Systems, LLC relating to the operation of an automotive parts manufacturing plant.

#### **Explanation of Modification**

On November 20, 2002, Visteon Systems, LLC submitted an application to the OAQ requesting that the BACT limit in Condition D.8.5 of the Part 70 permit be revised to correlate with the actual operating conditions of Thermal De-oiler #3. The request is in response to Second Significant Source Modification 041-14742, issued on December 26, 2001 and First Significant Permit Modification 041-14961, issued on January 10, 2002, which approved the construction and operation of Thermal De-oiler #3. Based on stack testing conducted recently, Thermal De-oiler #3 performed as predicted in regards to controlled emission rates and control efficiency, however, the unit did not achieve the BACT limit contained in the Significant Permit Modification of 0.004 pounds of VOC emitted per pound of oil applied. Therefore, the source has requested that the BACT limit be changed to 0.041 pounds of VOC emitted per pound of oil applied (which is derived by multiplying the maximum VOC loading to the thermal incinerator of 0.82 pounds per pound of oil applied by (1- the control efficiency of 95%)). In addition, the maxmum oil loading rate was much lower than anticipated, therefore, Visteon is requesting that the maximum loading rate be changed from 50 to 6.4 grams per core.

Visteon is also requesting that Condition D.8.9 be revised to remove requirements to keep records of "the amount and VOC content of each de-oiling material and solvent used" since there are no oil usage limits in the permit for Thermal De-oiler #3.

#### **Existing Approvals**

The source was issued a Part 70 Operating Permit T041-6896-00004 on February 17, 1999. The source has since received the following:

- (a) First Significant Source Modification No.: 041-10295, issued on March 15, 1999;
- (b) First Administrative Amendment No.: 041-10719, issued on April 10, 1999;
- (c) Second Administrative Amendment No.: 041-11046, issued on August 5, 1999;
- (d) First Minor Source Modification No.: 041-11582, issued on March 13, 2000;
- (e) First Minor Permit Modification No.: 041-12053, issued on May 25, 2000;
- (f) Third Administrative Amendment No.: 041-12419, issued on October 2, 2000;
- (g) Second Significant Source Modification No.: 041-14742, issued on December 26, 2001; and
- (h) First Significant Permit Modification No.: 041-14961, issued on January 10, 2002.

#### **Enforcement Issue**

There are no enforcement actions pending.

#### Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 20, 2002.

#### **Justification for Modification**

The Title V permit is being modified through a Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d)(1) which states "every significant change in existing monitoring Part 70 permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions shall be considered significant."

#### **Emission Calculations**

See Appendix A: page 1 of this document for detailed emissions calculations.

#### Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

Pollutant	Potential To Emit (tons/year)		
PM	0.00		
PM-10	0.20		
SO <sub>2</sub>	0.00		
VOC	<del>58.79</del> <b>63.29</b>		
CO	2.00		
NO <sub>x</sub>	2.40		

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

#### **Potential to Emit After Controls for the Modification**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	СО	NO <sub>x</sub>	HAPs
Thermal De-Oiler #3	0.2	0.2	0.00	<del>2.93</del> <b>3.16</b>	2.00	2.40	neg
PSD Significant Modification Threshold	25	15	40	40	100	40	N/A

This modification to an existing major stationary source is not major because the emission is less than the PSD significant levels for VOC. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

The thermal de-oiler (De-oiler #3) is equipped with a thermal incinerator for the control of volatile organic compounds (VOC). The PTE of VOC for the thermal de-oiler (after control) is 3.16 tons per year.

#### **Federal Rule Applicability**

There are no new Federal rules applicable to this source due to this permit modification.

#### State Rule Applicability - Individual Facilities

#### 326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The Thermal Deoiler #3 is subject to the provisions of 326 IAC 8-1-6. This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). Potential VOC emissions from the Thermal Deoiler #3 are 63.29 tons per year. Since the potential VOC emissions are greater than 25 tons per year, the requirements of 326 IAC 8-1-6 apply to the Thermal Deoiler #3. Visteon Systems, LLC originally submitted a BACT analysis, as required pursuant to 326 IAC 8-1-6, as part of the source modification application process.

In its original permit application, Visteon predicted that Thermal Deoiler #3 would have the following parameters:

- (a) The maximum production rate was estimated to be 1500 cores per hour;
- (b) The oil application rate was estimated to be 45 to 50 grams per core; and

(c) The loading of volatile organic compounds (VOCs) to the thermal oxidizer was estimated to be 0.081 pounds per pound of oil applied.

Visteon concluded that BACT for this unit was the use of an existing thermal oxidizer with a control efficiency of 95%. Based on stack testing conducted recently, Thermal De-oiler #3 performed as predicted in regards to controlled emission rates and control efficiency, however, the unit did not achieve the BACT limit contained in the Significant Permit Modification of 0.004 pounds of VOC emitted per pound of oil applied.

Visteon has submitted a revised BACT analysis, dated March 24, 2003, as part of this modification application. The revised BACT analysis contains an evaluation of different control options for the Thermal De-oiler #3.

The options considered in the BACT analysis for the Thermal De-oiler #3 are:

- (a) Existing thermal oxidizer with a control efficiency of 95%
- (b) Recuperative Thermal Incineration
- (c) Regenerative Thermal Incineration
- (d) Recuperative Catalytic Incineration
- (e) Regenerative Catalytic Incineration
- (f) Flare
- (g) Adsorption
- (h) Absorption
- (i) Condensation
- (i) Material Substitution

It was determined that options (b) through (i) are infeasible due to the following reasons:

- (a) Combustion control technologies including recuperative thermal incineration, regenerative thermal incineration, recuperative catalytic incineration, regenerative catalytic incineration and flares typically need supplemental fuel in the form of natural gas to assist with combustion. Concentrated VOC streams with high heat contents require less supplementary fuel than more dilute streams, however, using VOC streams with high heat contents requires the removal of heat from the system. The VOC content of the Thermal De-oiler #3 emission stream is expected to be low in concentration. Furthermore, none of the other control systems considered are capable of achieving a destruction efficiency of greater than the 95% anticipated for the system. Based on the combustion control technologies considered, Visteon believes that the existing thermal oxidizer is the best with regards to economics and control efficiency achieved.
- (b) The capture systems considered including adsorption, absorption and condensation are most effective with lower molecular weight compounds which are in the air stream in a moderate to high concentration. The VOCs present in the air stream from Deoiler #3 are high molecular weight compounds, which exist in a low concentration in the exhaust. Visteon believes that the existing thermal oxidizer will achieve a greater removal efficiency at a lower cost than any of the capture system options.

Therefore, BACT for the Thermal Deoiler #3 has been determined to be the following:

- (a) The existing thermal incinerator (rated at 5.5 MMBtu per hour) on the one (1) thermal deoiler (De-oiler #3) shall be in operation at all times that the de-oiler is in operation. The thermal de-oiler shall use less than 77.18 tons of oil per 12 consecutive month period, with compliance determined at the end of each month. The VOC shall be limited to 0.82 pound of VOC/ pound of oil used. These limits are required to limit VOC emissions for the thermal de-oiler to less than 63.29 tons of VOC per 12 consecutive month period. VOC emissions from the thermal de-oiler shall be controlled using the thermal incinerator with a minimum overall VOC control efficiency (including capture and destruction efficiencies) of 95%.
- (b) The thermal incinerator shall operate at all times that the process is in operation. When operating, the thermal incinerator on De-oiler #3 shall maintain a minimum operating temperature of 1,500° F and a gas residence time in the oxidizing zone for the incinerator of 1.5 seconds or a temperature and gas residence time determined in the compliance tests described in Condition D.8.7.

The above BACT determination was based on for Thermal Deoiler #3 having the following parameters:

- (a) Maximum production rate of 1,250 cores per hour;
- (b) The oil loading on parts is 6.4 grams per part;
- (c) The loading of VOCs to the thermal incinerator is 0.82 pounds of VOC per pound of oil applied; and
- (d) Maximum uncontrolled VOC emissions are 14.45 pounds per hour.

#### **Proposed Changes to the Part 70 Operating Permit**

The following changes are made as the Second Significant Permit Modification 041-16488-00004 to Part 70 Operating Permit No. T041-6896-00004 (new language shown in bold and deleted language shown with a line through it):

1. The BACT limit in Conditions D.8.5 and D.8.7 have been revised to correlate with the actual operating conditions of Thermal De-oiler #3 as determined in a recent stack test.

#### Emission Limitations and Standards [326 IAC 8-1-6] [326 IAC 2-2]

#### D.8.5 BACT Condition [326 IAC 8-1-6] [326 IAC 2-2]

Pursuant to 326 IAC 8-1-6, the thermal incinerator (rated at 5.5 MMBtu per hour) on the one (1) thermal de-oiler (De-oiler #3) shall be in operation at all times that the de-oiler is in operation. The thermal de-oiler shall use less than 77.18 tons of oil per 12 consecutive month period, with compliance determined at the end of each month. The VOC shall be limited to 0.82 pound of VOC/ pound of oil used. The thermal de-oiler shall be limited to 0.004 pound of VOC emitted per pound of oil used. These limits are This limit is required to limit VOC emissions for the thermal de-oiler to less than 58.69 63.29 tons of VOC per 12 consecutive month period. VOC emissions from the thermal de-oiler shall be controlled using the thermal incinerator with a minimum overall VOC control efficiency (including capture and destruction efficiencies) of 95%. Compliance with the requirement shall also render 326 IAC 2-2 not applicable.

#### **Compliance Determination Requirements**

#### D.8.7 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, the Permittee shall perform VOC testing on Thermal De-oiler #3 to confirm the validity of the uncontrolled VOC emission factor of 0.004 0.82 pound of VOC emitted per pound of oil used, as well as the VOC control efficiency for the one (1) thermal incinerator, as required in Condition D.8.5, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

- There are no changes to Condition D.8.9. The requirements to keep records of the amount of de-oiling material used will not be removed because the emission limitation of 63.29 tons per year determined in the BACT analysis is based on the oil usage rate of 17.62 pounds per hour which was calculated from the amount and VOC content of the de-oiling material and solvent used. There will be no changes to Condition D.8.9 as a result of the source's request.
- 3. A quarterly reporting condition and a quarterly report form for the oil usage limit has been added to the permit.

#### D.8.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.8.5 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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Visteon Systems, LLC Connersville, Indiana Permit Reviewer: Alic Bent/EVP

Phone:

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

# Part 70 Quarterly Report

\$ F F	Source Name: Source Address: Mailing Address: Part 70 Permit No.: Facility: Parameter: Limit:	4747 Western Aven T041-6896-00004 Thermal De-oiler #3 VOC The thermal de-oile consecutive month month. The VOC sh These limits are rec less than 63.29 ton emissions from the incinerator with a n capture and destru	ue, Connersville, Indiana 47 ue, Connersville, Indiana 47 B er shall use less than 77.18 to period, with compliance de nall be limited to 0.82 pound	ons of oil per 12 etermined at the end of each of VOC/ pound of oil used. as for the thermal de-oiler to e month period. VOC ontrolled using the thermal
I	Month	Column 1	Column 2	Column 1 + Column 2
I		This Month	Previous 11 Months	12 Month Total
	Month 1			
	Month 2			
	Month 3			
	9	No deviation occur	red in this quarter.	
	9	Deviation/s occurre Deviation has been	ed in this quarter. reported on:	
	Subm Title / Signa Date:	iture:		

Attach a signed certification to complete this report.

Page 8 of 8 T041-6896-00004

#### Conclusion

The operation of this automotive parts manufacturing plant shall be subject to the conditions of the attached proposed Significant Permit Modification No. 041-16488-00004.

# Appendix A: Emission Calculations VOC and Particulate From Thermal De-Oiler

Visteon Systems LLC 4747 Western Avenue, Connersville, Indiana 47331 041-16488 041-00004 Alic Bent/EVP February 10, 2003

State Potential Emissions (uncontrolled):							
Material (as applied)	Process	Maximum Oil Loading (grams/core)	Max. Production Rate (cores/hour)	VOC Emission Rate (Ib VOC/Ib Oil Applied)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Oak Draw 951 (Oil)	De-Oiler #3	6.4	1,250	0.82	14.45	346.78	63.29

Total Potential Emissions:		14.45	346.78	63.29
		Controlled	Controlled	Controlled
	VOC	VOC lbs per Hour	VOC lbs per Day	VOC tons per Year
Total Controlled Emissions:	95.00%	0.72	17.34	3.16

#### Methodology:

Oil Application Rate Pounds per Hour = (Maximum Oil Loading (gms/core) \* Maximum Production Rate (cores/hr) \* 1lb/454 gm)

Potential VOC Pounds per Hour = Oil Application Rate (lb/gal) \* VOC Emission Rate (lb VOC/lb oil applied)

Potential VOC Pounds per Day = Oil Application Rate (lb/gal) \* VOC Emission Rate (lb VOC/lb oil applied) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Hour (lb/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Total = Sum of all solvents used

Controlled emission rate = uncontrolled emission rate \* (1 - control efficiency)